

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

SilverRock Development Company, *et al.*,  
Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11647 (MFW)  
(Jointly Administered)

**Re: Docket Nos. 358, 392**

**CERTIFICATION OF COUNSEL REGARDING REVISED PROPOSED ORDER  
APPROVING BIDDING PROCEDURES MOTION**

The undersigned counsel to Debtors in the above captioned chapter 11 case hereby certifies as follows:

1. On February 19, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Motion for Entry of Order (I) Authorizing and Approving (A) Bid Procedures and (B) Form and Manner of Notice of Bid Procedures* [D.I. 358] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). .
2. On March 12, 2025, the Debtors filed a *Notice of Filing of Revised Proposed Order Approving Bidding Procedures Motion* [D.I. 392], which included as an exhibit a revised proposed form of order approving the Motion (the “Revised Order”)
3. A hearing on the Motion occurred on March 12, 2025 (the “Hearing”), at which the Court granted the Motion and directed the Debtors to upload the Revised Order.

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<sup>1</sup>The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: SilverRock Development Company, LLC (5730), RGC PA 789, LLC (5996), SilverRock Lifestyle Residences, LLC (0721), SilverRock Lodging, LLC, (4493), SilverRock Luxury Residences, LLC (6598) and SilverRock Phase 1, LLC (2247). The location of the Debtors’ principal place of business and the Debtors’ mailing address is 343 Fourth Avenue, San Diego, CA 92101.

4. Following the Hearing, the Debtors, in consultation with the major constituents and the Office of the United States Trustee made some minor corrections to the Proposed Order, fixing typographical errors. The parties have all agreed upon the revised form of order

5. The parties have all agreed upon the revised form of order attached hereto as **Exhibit A.**

WHEREFORE, the Debtor respectfully requests that the Court enter the proposed order attached hereto as Exhibit A.

Dated: March 13, 2025

Respectfully submitted,

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